

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

<hr style="border: 0.5px solid black;"/> In re:)	Chapter 11
)	
THE IT GROUP, INC., et at,)	Case No. 02-10118 (MFW)
)	
Debtors.)	Jointly Administered
)	
<hr style="border: 0.5px solid black;"/> IT LITIGATION TRUST,)	
)	
Plaintiff,)	
)	
v.)	Civ. A. No. 04-CV-1268 (KAJ)
)	
DANIEL A. D'ANIELLO, FRANCIS J. HARVEY,)	
JAMES C. MCGILL, RICHARD W. POGUE,)	
PHILLIP B. DOLAN, E. MARTIN GIBSON,)	
ROBERT F. PUGLIESE, CHARLES W.)	
SCHMIDT, JAMES DAVID WATKINS,)	
ANTHONY J. DeLUCA, HARRY J. SOOSE,)	
THE CARLYLE GROUP, THE CARLYLE)	
GROUP L.L.C., CARLYLE PARTNERS II, L.P.,)	
CARLYLE SBC PARTNERS II, L.P., CARLYLE)	
INTERNATIONAL PARTNERS II L.P.,)	
CARLYLE INTERNATIONAL PARTNERS III,)	
C/S INTERNATIONAL PARTNERS, CARLYLE)	
INVESTMENT GROUP, L.P., CARLYLE-IT)	
INTERNATIONAL PARTNERS, LP,)	
CARLYLE-IT INTERNATIONAL PARTNERS II,)	
L.P., CARLYLE-IT PARTNERS L.P.,)	
and T.C. GROUP, L.L.C.,)	
)	
Defendants.)	
)	

**PLAINTIFF'S MOTION FOR LEAVE TO FILE
A SECOND AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 15(a) and Local Rule 15.1, Plaintiff The IT Litigation Trust, by and through counsel, respectfully moves the Court pursuant to Fed. R. Civ. P. 15 (a), to file a Second Amended Complaint in this matter. The Trust requests that the Court allow the

requested amendments for in the interest of justice and for the reasons set-forth in the supporting Memorandum. Pursuant to Local Rule 15.1, a copy of the Proposed Second Amended Complaint is attached hereto as Exhibit A .

Dated: January 10, 2006

THE BAYARD FIRM

By: 

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- and -

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IT LITIGATION TRUST